

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Dallas Division**

CHARLENE CARTER,

Plaintiff,

v.

SOUTHWEST AIRLINES CO., AND
TRANSPORT WORKERS UNION OF AMERICA,
LOCAL 556,

Defendants.

Civil Case No. 3:17-cv-02278-X

DECLARATION OF CHARLENE CARTER

I, Charlene Carter, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am the plaintiff in the above-captioned lawsuit.
2. I am over the age of 21, of sound mind, and capable of making this declaration. The facts stated herein are true and correct and are within my personal knowledge.
3. From on or about September 26, 1996 until to March 14, 2017, I was employed as a flight attendant for Southwest Airlines Co. ("Southwest"). Southwest terminated my employment following a complaint made by Transport Workers Union of America, Local 556's then president, Audrey Stone.
4. I never had the means to access, nor have I ever accessed Southwest's computer systems since the termination of my employment with Southwest on March 14, 2017.
5. I never contacted or attempted to contact any Southwest Airlines Co. employee to request or encourage them to access Southwest's computer systems or to look up Stone's information on its computer systems.

6. On or about June 25, 2020, a Southwest flight attendant called me. During the conversation, I asked the flight attendant where Stone was based. Based on my 20 years of employment with Southwest, I know that is information that is commonly known among flight attendants. During the following week, I received information that Stone was based out of Baltimore.

7. During the week of June 25, 2020, and the following week, I also received unsolicited information from two other Southwest flight attendants regarding Stone's upcoming work schedule, including her flight arrival and departure times, travel destinations, the dates she was traveling, and the names of the hotels she would use. I did not request this information. Since then, I have not received any information regarding Stone's trips. While I know who gave me the information, I do not know how they obtained their information or from whom.

8. From my 20 years of employment as a Southwest flight attendant, I know that all flight attendants' flight departure and arrival times, destinations, and the names of the hotels they use, could be viewed in the list of flights from each base without having to view a flight attendant's "board," which is one section on the online system where Southwest employees can view other flight attendants' schedules. I also know that flight attendants frequently shared trip information by printing and circulating trip sheets containing that information, and left those trip sheets in airport lounges and on planes. I also know that Defendant Transport Workers Union Local 556 has used Southwest's computer system to locate flight attendants for the campaigns to elect union officers and to ratify collective bargaining agreements.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: July 16, 2020


CHARLENE CARTER